

WEINBERG WHEELER
HUDGINS GUNN & DIAL



Ryan T. Gormley, Esq.
rgormley@wwhgd.com
Nevada Bar No. 13494
WEINBERG, WHEELER, HUDGINS,
GUNN & DIAL, LLC
6385 South Rainbow Blvd., Suite 400
Las Vegas, Nevada 89118
Telephone: (702) 938-3838

*Local Counsel for Plaintiff,
Ernest Bock L.L.C.*

John F. Palladino, Esq.
john@hankinsandman.com
Evan M. Labov, Esq.
evanl@hankinsandman.com
HANKIN SANDMAN PALLADINO
WEINTROB & BELL, P.C.
30 South New York Avenue
Atlantic City, NJ 08401
Telephone: (609) 344-5161

*Pro Hac Counsel for Plaintiff,
Ernest Bock L.L.C.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ERNEST BOCK, L.L.C.,

Plaintiff,

vs.

Case No.: 2:19-cv-01065-JAD-EJY

PAUL STEELMAN, individually; MARYANN
STEELMAN, individually; PAUL STEELMAN,
as trustee of the Steelman Asset Protection Trust;
MARYANN STEELMAN, as trustee of the
Steelman Asset Protection Trust; JIM MAIN, as
trustee of the Steelman Asset Protection Trust;
STEPHEN STEELMAN; SUZANNE
STEELMAN-TAYLOR; PAUL STEELMAN as
trustee of the Paul C. Steelman and Maryann T.
Steelman Revocable Living Trust; MARYANN
STEELMAN, as trustee of the Paul C. Steelman
and Maryann T. Steelman Revocable Living Trust;
PAUL STEELMAN, as the trustee of the Paul
Steelman Gaming Asset Protection Trust;
KEEPSAKE, INC.; SMMR, LLC; SMMR, LLC,
SERIES A-Z; SSSSS, LLC; SSSSS, LLC, SERIES
B; CHRISTIANA, LLC; CHRISTIANA, LLC,
SERIES A-Z; COMPETITION INTERACTIVE,
LLC; PAUL STEELMAN, LTD.; STEELMAN
PARTNERS, LLP; PAUL STEELMAN DESIGN
GROUP, INC.; SPT HOLDINGS, LLC, SERIES
B; AARON SQUIRES; and MATTHEW
MAHANEY,

Defendants.

**JOINT STIPULATION SETTING
BRIEFING SCHEDULE FOR
PARTIAL MOTIONS TO DISMISS,
MOTIONS TO STAY, AND
ANTICIPATED COUNTERMOTION TO
THE MOTIONS TO STAY
(FIRST REQUEST)**

ECF No. 218



Plaintiff Ernest Bock, L.L.C. (“Bock”) and Defendants, by and through their respective undersigned counsel, hereby submit this Joint Stipulation (the “Stipulation”) to set a briefing schedule for Defendants’ Partial Motions to Dismiss and related joinders, [see **ECF Nos. 202, 211, and 214**], Defendants’ Motions to Stay and related joinders, [see **ECF Nos. 201, 210, and 215**], and Plaintiff’s anticipated Countermotion to Defendants’ Motions to Stay (the “Substantive Motions”). Pursuant to LR 7-2(b), the deadline for Bock to file and serve a response to the Partial Motions to Dismiss and related joinders is fourteen (14) days after service of the Partial Motions to Dismiss, which were filed and served on January 10, 2022, and January 18, 2022. Pursuant to LR 7-2(b), the deadline for Bock to file and serve a response to the Motions to Stay and related joinders is fourteen (14) days after service of the Motions to Stay, which were filed and served on January 10, 2022, and January 18, 2022.

By separate stipulation and pending completion of said briefing schedule, the parties seek to continue and reset the hearing presently scheduled for February 14, 2022 before Magistrate Judge Youchah, [see **ECF Nos. 205, 212, and 216**], on Plaintiff’s Motion to Extend and Defendants’ Countermotion for a Protective Order and related joinders, [see **ECF Nos. 197, 198, 206, and 208**] (the “Discovery Motions”).

Bock has initiated this request and obtained the Defendants’ agreement to submit this Joint Stipulation because: (i) there are ten motions in various stages of briefing and an anticipated Countermotion yet to be filed, [see **ECF Nos. 197, 198, 201, 202, 206, 208 210, 211, 214, and 215**]; (ii) a unified briefing schedule is underway on the Discovery Motions; (iii) the interrelations and timing variations between the Substantive Motions would be clarified and simplified with a unified briefing schedule; and (iv) the Substantive Motions raise numerous, complicated issues that will determine whether and how this case proceeds.

Bock and the Defendants hereby stipulate to the following briefing schedule:

1. On or before **February 2, 2022**, Bock shall file its responses to the Partial Motions to Dismiss and related joinders, [**ECF Nos. 202, 211, and 214**], and the Motions to Stay and related joinders, [**ECF Nos. 201, 210, and 215**].



2. On or before **February 2, 2022**, Bock shall file any Countermotion to the Motions to Stay and related joinders, [ECF Nos. 201, 210, and 215].
3. On or before **February 16, 2022**, Defendants shall file any replies in support of the Partial Motions to Dismiss and related joinders, [ECF Nos. 202, 211, and 214], and the Motions to Stay and related joinders, [ECF Nos. 201, 210, and 215].
4. On or before **February 16, 2022**, Defendants shall file any responses to Bock's Countermotion to the Motions to Stay and related joinders.

[Remainder of Page Left Intentionally Blank]

5. On or before **February 23, 2022**, Bock shall file any reply in support of its Countermotion to the Motions to Stay and related joinders.

Dated: January 20, 2022

WEINBERG, WHEELER, HUDGINS, SOLOMON DWIGGINS FREER & GUNN & DIAL, LLC STEADMAN, LTD.

BY: /s/ John F. Palladino
RYAN T. GORMLEY, Esq., #13494
rgormley@wwhgd.com
6385 South Rainbow Blvd., Suite 400
Las Vegas, NV 89118
Local Counsel for Plaintiff

BY: /s/ Roberto M. Campos
ROBERTO M. CAMPOS, ESQ., #15189
rcampos@sdfnlaw.com
9060 West Cheyenne Avenue
Las Vegas, NV 89129
Attorney for the Attorney Defendants

HANKIN, SANDMAN, PALLADINO, WEINTROB & BELL, P.C.
JOHN F. PALLADINO, ESQ. (*pro hac vice*)
john@hankinsandman.com
EVAN M. LABOV, ESQ. (*pro hac vice*)
evanl@hankinsandman.com
30 South New York Avenue
Atlantic City, NJ 08401
Pro-Hac Counsel for Plaintiff

BALLARD SPAHR, LLP


BY: /s/ Maria A. Gall
MARIA A. GALL, ESQ., #14200
gallm@ballardspahr.com
1980 Festival Plaza Drive, Suite 900
Las Vegas, NV 89135
Attorney for the Corporate Defendants

BROWNSTEIN HYATT FARBER SCHRECK, LLP

BY: Emily A. Ellis
FRANK M. FLANSBURG III, ESQ., #6974
fflansburg@bhfs.com
EMILY A. ELLIS, ESQ., #11956
eellis@bhfs.com
EMILY L. DYER, ESQ., #14512
edyer@bhfs.com
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614
Attorneys for the Steelman Defendants

ORDER

IT IS SO ORDERED.



U.S. District Judge Jennifer A. Dorsey
Dated: January 24, 2022

